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5 Sellers, dba Farmland Transportation

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FILED

JUL 26 2006

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - FRESNO

11 LUIS AVILA ESPINOZA and GUADALUPE CASE NO. CV-F-05-0411 AWI LJO
12 AVILA ,

13 Plaintiff,

14 v.

15 JACKIE LADD, PCM EXPRESS, business
form unknown; JOYCE COOK and AGNES
SELLERS dba FARMLAND
16 TRANSPORTATION, business form
unknown, , and DOES 1 through 20 ,
inclusive,

**STIPULATION AND ORDER TO
CONTINUE DISCOVERY DATES**

Action Filed: March 28, 2005
Trial Date: February 5, 2007

18 Defendants.

19 The following Stipulation is entered into between Plaintiffs, LUIS AVILA
20 ESPINOZA and GUADALUPE AVILA and Defendants JACKIE LADD, PCM EXPRESS, ;
21 JOYCE COOK and AGNES SELLERS dba FARMLAND TRANSPORTATION. The parties to
22 the above entitled action by and through their respective counsel of record hereby agree and stipulate
23 as follows:

24 1. The Court issued a Scheduling Conference Order with the following
25 deadlines:

26 (a) Initial Expert Witness Disclosure: August 1, 2006;
27 (b) Supplemental Expert Witness Disclosures: August 8, 2006;

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WILKINS,
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CZESHINSKI LLP
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Suite 204
Fresno, CA 93720

Stipulation and Order To Continue Discovery Cut-Off Dates

1 (c) Non-Expert Discovery Cut-off and Related Discovery Motions:

2 August 11, 2006; and

3 (d) Expert Discovery and Related Discovery Motions: September 15, 2006.

4 The parties have been engaging in written discovery as well as depositions in this
5 matter for several months. The completion of depositions necessary in the case has been delayed
6 due to service of the third party percipient witnesses not being in the control of any of the parties to
7 the case, and several residing in Mexico.

8 The parties have now scheduled a number of depositions for August and September
9 of 2006. Because of the delay in completing non-expert depositions, the parties have agreed to
10 continue the above cut-off dates as follows:

11 (a) Initial Expert Witness Disclosure: September 15, 2006;

12 (b) Supplemental Expert Witness Disclosures: September 22, 2006

13 (c) Non-Expert Discovery Cut-off and Related Discovery Motions:

14 September 25, 2006; and

15 (d) Expert Discovery and Related Discovery Motions: October 20, 2006.

16 The parties respectfully request the Court to enter an amendment to the Scheduling
17 Order consistent with the stipulation of the parties above.

18 Dated: July 21, 2006

19 WILKINS, DROSHAGEN & CZESHINSKI LLP

20 By _____

21 John A. Droshagen
22 Attorneys for Defendant Joyce Cook and Agnes
23 Sellers, dba Farmland Transportation

24 Dated: July 18, 2006

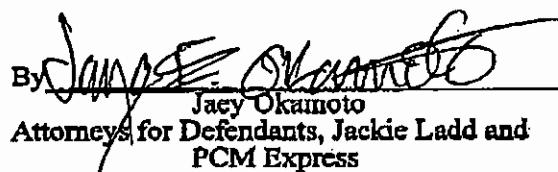
25 LAURETI & SIDIROPOULOUS, A.P.C.

26 By _____

27 Larry J. Sidiropoulos,
28 Attorney for Plaintiffs

1 Dated: July 21, 2006

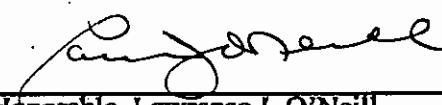
LIEDLE, GETTY & WILSON, LLP

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3 By 
Jaey Okamoto
4 Attorneys for Defendants, Jackie Ladd and
PCM Express
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7 ORDER

8 The Court, having reviewed the Stipulation of the parties and finding good cause,
9 hereby issues an order continued the following dates and deadlines as follows:

10 (a) Initial Expert Witness Disclosure: September 15, 2006;
11 (b) Supplemental Expert Witness Disclosures: September 22, 2006
12 (c) Non-Expert Discovery Cut-off and Related Discovery Motions:
13 September 25, 2006; and
14 (d) Expert Discovery and Related Discovery Motions: October 20, 2006.

15 IT IS SO ORDERED:
16 
17 July 26, 2006
18 Honorable, Lawrence J. O'Neill

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